

REMARKS/ARGUMENTS

Applicant would like to thank the Examiner for the careful consideration given the present application. The application has been carefully reviewed in light of the Office action, and amended as necessary to more clearly and particularly describe the subject matter which applicant regards as the invention.

Claims 6 and 12 have been amended. Claim 13 has been added.

Claims 6 and 12 are rejected under 35 U.S. C. 112, second paragraph. Claims 6 and 12 have been amended and the antecedent basis has been provided .

Claims 1-12 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Griebenow (W.O. 01/46923) in view of Ogasawara (U.S. Patent No. 6,513,015). For at least the following reasons, the examiner rejection is respectfully traversed.

None of the references disclose or suggest “means for comparing the surveillance recorded data of the first object with the position locating recorded data of the second object to determine if the surveillance mean and the position locating means are referencing a same target” as recited in claim 1. Similar language is found in claim 7. The Office action cites Griebenow as teaching these elements (Office action 4/19/2005, page 2).

Griebenow discloses a monitoring system for storing radio frequency identification (RFID) data from a RFID system and storing video data from a video system. In Griebenow, the data is transmitted over the internet to a central host site where the data is stored and may be later accessed by an operator.

Although Griebenow discloses a RFID system and a video system, the Griebenow monitoring system merely records event data. The Griebenow monitoring system does *not detect and process each of the object images* acquired by the RFID system and the video system during

an event. Since the Griebenow monitoring system does not detect and process each of the object images, the Griebenow monitoring system cannot *compare* the data of the object images. Therefore, the Griebenow monitoring system does not teach comparing the RFID data and video data of the objects to determine if the RFID data and video data are referencing the same target object. Thus, even if combined, the references do not disclose or suggest all the elements of the claimed invention.

Furthermore, none of the references disclose or suggest “at least one surveillance means and one position locating means for independently detecting and monitoring at least one object located within a predetermined area” as recited in claim 1. Similar language is found in claim 7. The Office action acknowledges that Griebenow does not teach these elements, but cites Ogasawara as teaching the elements (Office action 4/19/2005, page 3).

Ogasawara discloses an identification system that interrogates and recognizes a customer ID card. In Ogasawara, a videographic image is taken of the customer *only after* the identification system determines whether there is a customer ID or if a person activates a position sensor.

Since a video image of the customer is not take until *after* interrogation of any customer ID or activation of a position sensor, the Ogasawara videographic image system is *dependent* on a customer ID recognition or position system. Therefore, Ogasawara does not teach a videographic image system that *independently* detects and monitors an object located in an area. Thus, even if combined, the references do not disclose or suggest all the elements of the claimed invention.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the

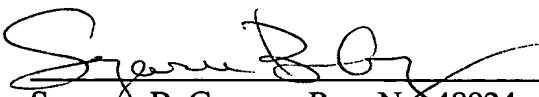
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application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No. 35098US1.

Respectfully submitted,

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